

**Remarks/Arguments**

Claims 1-9 are pending. Claim 1 has been amended to more clearly and distinctly recite the subject matter that applicants regard as their invention. No new matter is believed to be added by the amendment.

**Rejection of claims 1-9 under 35 USC 103(a) as being unpatentable over Smyers et al. (WO 98/4727A1) and Simms et al (US 6,161,155).**

Applicants submit that for the reasons discussed below present claims 1-9 are patentably distinguishable over the combination of Smyers and Simms.

Applicants submit that Smyers fails to teach processing data in bus packets having variable length. Applicants submit that the portions of Smyers cited by the examiner fail to teach such a feature.

As an initial matter, one must distinguish between the expression "source packet," "data block," and "bus packet."

In that regard, Applicants have attached herewith a copy of IEC 61883-1, page 49. On this page in Fig. 4, the relationship between the above-mentioned phrases is illustrated. As shown, the data emerges from the data source in constant length source packets. A source packet consists of a number of fixed length data blocks. Shown are 4 data blocks for building a source packet, but the standard allows for 1, 2, 4, or 8 data blocks.

The bus packets may have different lengths as shown at the bottom of page 49. It is allowed to have a variable number of data blocks in a bus packet. The easiest implementation for the data transport is to use the same number of data blocks in a bus packet as the source packet. In this case, no data block counter is required. Each source packet occupies the same amount of memory space, and therefore, it is a simple matter for the memory management unit to find the source packets.

Applicants submit that Smyers discloses the use of variable length bus packet mode is hindsight view. In page 6, lines 11-14, Smyers merely says that a bus packet is formed in the form required by the bus structure. Applicants submit that in view of the above this means the easiest form of data transmission, namely bus packets having all the data blocks of one source packet. Nothing further is said in this regard on page 7, lines 24-26.

Smyers is completely silent to the problem of how the memory management unit could easily find source packet boundaries in the case that variable length bus packets are used for transmission.

As a result, applicants submit that there is absolutely no motivation for combining Smyers with Simms in the manner suggested by the examiner. Furthermore, Simms is related to data transport over a parallel bus, in particular a SCSI bus having 16 bit lines and two 8 bit data packets are transferred in one clock cycle. With the SCSI bus, block data can be transferred into the buffer memory of a receiving device (col. 1, lines 34-38). This block data may have variable length (col. 1, lines 38-40).

By contrast, according to the claimed invention, the source packet length is constant. Thus, it is not a problem to find the boundaries of variable length data blocks. Rather, the invention is directed to the problem of finding the boundaries of constant length source packets that will be transmitted over a serial bus with variable length bus packets. Simms is completely silent as to this problem.

In view of the above, Applicants submit that the cited prior art references fail to teach or suggest all of the features of the claimed invention, and that the references should not be combined in the manner suggested.

Having fully addressed the Examiner's rejections, Applicants submit that the present application is in condition for allowance and respectfully request such action. No fee is believed due in regard to the present amendment. However, if a fee is due, please charge the fee to Deposit Account 07-0832. Should any

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questions arise regarding any of the above, the Examiner is requested to contact the undersigned at 609-734-6815.

Respectfully submitted,

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